UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO YOUNGSTOWN DIVISION

WENDELL H. STONE COMPANY, INC. d/b/a STONE & COMPANY, individually and on behalf of all others similarly situated,

Case No.: 4:18-cv-02212

Plaintiff,

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COMMERCIAL INDUSTRIAL ROOFING, LLC, an Ohio limited liability company,

Defendant.

MOTION FOR PRO HAC VICE ADMISSION OF PATRICK H. PELUSO

Pursuant to Local Rule 83.5(h), Plaintiff Wendell H. Stone Company, Inc. ("Stone" or "Plaintiff"), through its undersigned counsel, respectfully moves the Court for an order granting admission *pro hac vice* of Patrick H. Peluso of Woodrow & Peluso, LLC for the purpose of appearing as counsel of record on behalf of Plaintiff and the alleged Class. In support of this motion, the undersigned states as follows:

- 1. Mr. Peluso is a partner at Woodrow & Peluso, LLC, which is located at 3900 E. Mexico Ave., Suite 300, Denver, Colorado 80210. His telephone number is 720-213-0676 and his email address is ppeluso@woodrowpeluso.com.
- 2. The affidavit of Mr. Peluso contains the specific information required by Local Rule 83.5(h) and is attached hereto as Ex. A.
 - 3. As explained in the accompanying affidavit, Mr. Peluso is a member in good

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standing in all courts to which he has been admitted. Further, he has never been disbarred nor has he faced any disciplinary action from any court.

For the foregoing reasons, counsel for Plaintiff respectfully requests that this Court enter an Order granting the admission *pro hac vice* of Patrick H. Peluso.

Dated: October 1, 2018 /s/ William M. Harrelson, II

One of Plaintiff's attorneys

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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the above captioned document was served upon counsel of record by filing such papers via the Court's ECF system on October 30, 2018.

/s/ William M. Harrelson, II